

APR 07 2005

From: Tom Becnel [tbecnel@spinexp.com]
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To: rules.comments@mms.gov
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The idea of proposing fees for the routine filings (e.g. APD, APM, EP, DOCD etc.) listed in the Federal Register is both unreasonable and unwarranted. Operators expose millions of dollars each year at GOM Lease Sales for the right to explore for, develop and produce hydrocarbons. They also pay out millions in rental fees and royalties to the DOI. One would think that the enormous amounts of revenue collected by the MMS would be more than sufficient to cover the time and effort put in by its employees to review and approve our submittals.

How will the MMS handle the payment for verbal approvals or denied requests? Does the old saying "The check's in the mail", ring a bell? Will there be any refunds?

**\$10, 000 for a Voluntary Unitization Proposal is exorbitant.
(Operators are already spending thousands of dollars to prepare these proposals.)**

**\$4,600 for a Downhole Commingling Request is exorbitant.
(These are sometimes reviewed in a matter of hours. All the data is furnished by the operator.)**

**\$3,100 for a 500 feet from the lease/unit line production request is exorbitant.
(Again, all the data is furnished by the operator.)**

**\$1,700 for Suspensions of Operators
(Does this mean? SOO's & SOP's, Do you mean Suspensions of Operations?)**

TGB